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ABSTRACT

Historical perspectives concerning accreditation in postsecondary education, the structure of accreditation, and possible future roles for the process are examined. It is suggested that the interplay of four groups provides a basis to consider the possible future in the field of accreditation. These groups are: state government responsibilities and activities, specialized academic disciplines and their voluntary national associations, diverse educational institutions and their regional and national associations, and the federal government and its listing or statistical responsibilities. Recent exemplary cooperative arrangements between states and accrediting associations are cited, and it is suggested that these new arrangements point away from a federal role and toward the future strong role of voluntary, nonprofit accrediting associations. The connotations of concepts such as "eligibility," "approval," and "accreditation" are explored, since a recurring problem in the field of accreditation is the use of widely varied terms by associations or agencies. Accreditation is examined historically according to the the following five periods: (1) from the formal establishment of the University of the State of New York as the first accrediting agency in 1787, until 1914, when the Association of American Universities formally listed recognized colleges; (2) from 1914 to 1935, when a more qualitative and less quantitative approach to accreditation was implemented; (3) from 1935 until 1948, when the listing form of accreditation was terminated; (4) from 1948 until 1975; and (5) from 1975 until 1980. (SW)

Report Six *1980*

ACCREDITATION: HISTORY, PROCESS, AND PROBLEMS

Fred F. Harcleroad

U.S. DEPARTMENT OF HEALTH, EDUCATION & WELFARE
NATIONAL INSTITUTE OF EDUCATION

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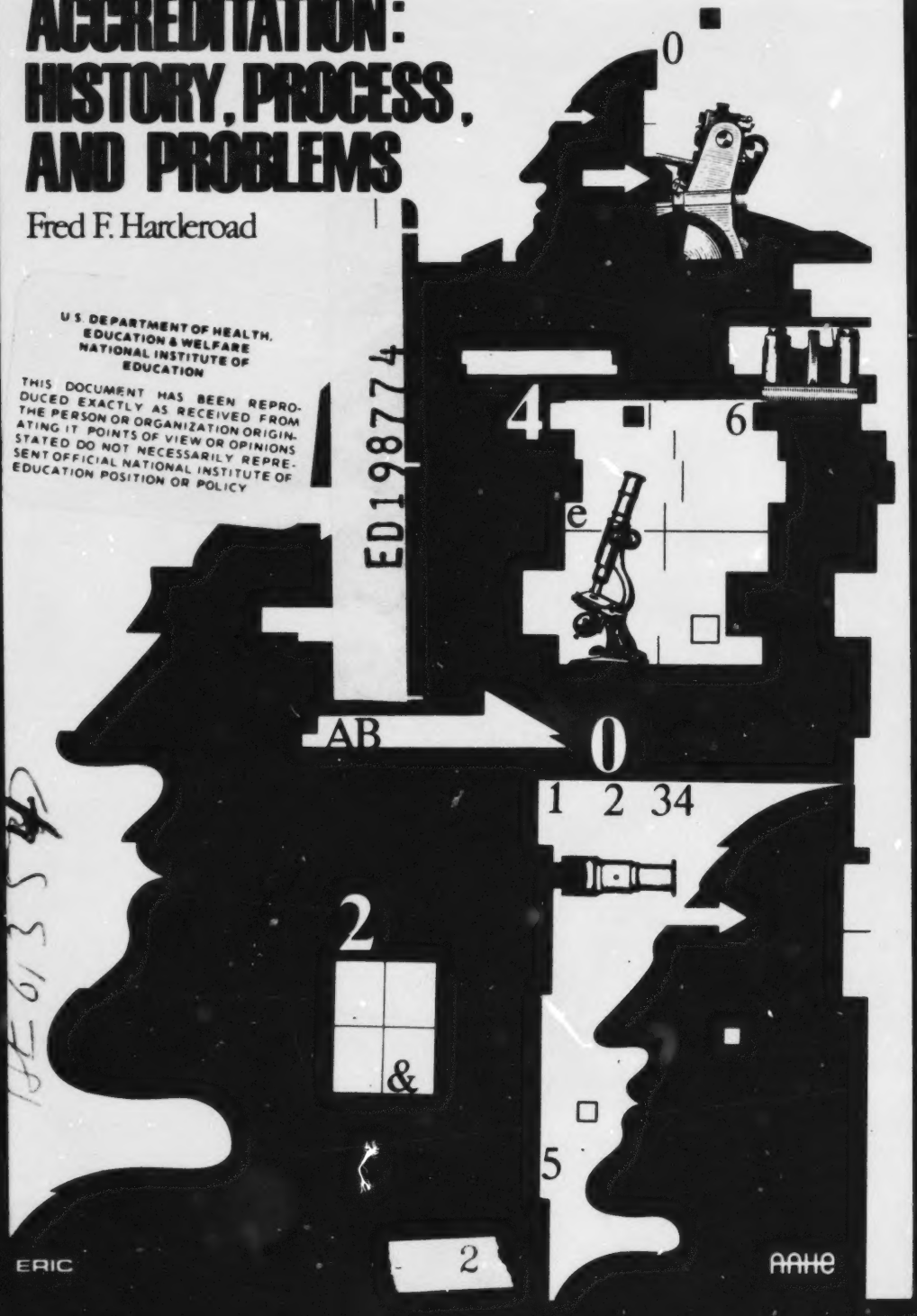

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Accreditation: History, Process, and Problems

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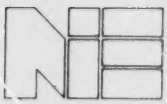

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Foreword

"Nongovernmental accreditation, tempered by more than a half century of heat from controversy and problems, has established its place in society. From a position of strength, it should now welcome and react favorably to constructive criticism." So wrote Frank G. Dickey, executive director, and Jerry W. Miller, associate director, of the now-defunct National Commission on Accrediting, in an ERIC/Higher Education report of 1972.

Four years later, David A. Trivett, of the Clearinghouse staff, wrote on the public and institutional perceptions of accreditation, observing that accreditation "is a political problem, and points of view are presented as obvious truths to bolster and maintain the role of the many parties involved."

In June of 1980, the *Chronicle of Higher Education* reported that few aspects of higher education have been more turbulent than accreditation and predicted that fundamental changes would take place in the direction of tempering the federal government's considerable involvement in accreditation.

Both postsecondary accreditation and its uses by the federal government long have been sticky issues. States monitor and sanction educational institutions within their borders; regional, disciplinary, and other associations "approve" programs at colleges and universities; and the federal government makes determinations of institutional "eligibility" for federal monies based on information supplied by independent accreditating agencies as well as the states. But there are persistent problems, one of which is what criteria accrediting groups should use to determine institutional or program "quality." The ERIC/Higher Education publication by Judith Lawrence and Kenneth Greene of the Higher Education Research Institute dealt with this topic.

This most recent Clearinghouse publication on accreditation is by Fred Harcleroad, professor of higher education at University of Arizona, who has been associated for many years with accreditation and its policy formation by the voluntary sector. He develops a historical framework within which the pieces of the accreditation debate have been forged. The connotations of concepts such as "eligibility," "approval," and "accreditation" itself are explored and recent exemplary cooperative arrangements between states and accrediting associations are cited. In the author's opinion, these new arrangements point away from a federal role and toward the future strength of voluntary, nonprofit accrediting associations.

The perspective on accreditation that Dr. Harcleroad's analysis contains should be of great value to all who participate in clarifying what accreditation does and does not signify.

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Overview

"Accreditation" provides a superb example of the American way of solving new social problems by voluntarily developing new social institutions. The founders of our republic carefully separated and delimited government powers. They worried about a strong statist-oriented central government and the first ten Amendments were designed against such a possibility. The First Amendment guaranteed freedom of assembly and the continuing extensive use of voluntary associations. Voluntary enterprise thus plays a major social role along with public enterprise (government) and private enterprise (business and commerce). With the 10th Amendment, the now-50 states and their citizens retained their "general" powers and the federal government was granted "limited" powers. In this context, thousands of voluntary educational associations developed in a unique way in the United States and in some of these associations membership standards and/or associational sanctions became a critical part of what today is called "accreditation."

Accreditation and its development have been based on four distinct but closely-related factors: (1) state government responsibilities and activities, (2) specialized academic disciplines and their voluntary national associations, (3) diverse educational institutions and their voluntary regional and national associations, and (4) the federal government and its "listing" or statistical responsibilities. An understanding of the interplay of these four groups provides much of the background needed to make an estimate of the possible future in the field of accreditation.

These four varied groups have developed complementary, closely intertwined roles. First, state governments have the ultimate responsibility for almost all educational institutions (except federal institutions, mostly military). They incorporate, by charter or license, those institutions that provide educational services within their borders; also, they license individuals to perform many occupations and professions within the state. In addition, a small but significant number of states (17) have established agencies with direct legal charges to "accredit" institutions and programs, or with general powers used for this purpose. Second, voluntary accrediting associations (regional institutional, national institutional, and national programmatic) accredit diverse institutions and programs of all types in the United States, its territories, and in at least 10 other countries. The results of this voluntary activity are

written into many state licensing laws affecting both individuals and institutional operations. Third, current federal laws often require "listing" of institutions, based on voluntary accreditation, for determination of the rights both of institutions and of individuals to participate in federal funding programs. Also, some federal agencies conduct "accreditation" activities of their own to approve programs: those that send students into federal hospitals for field work (Veterans Administration, for example); and those that provide education directly affecting interstate commerce, such as schools for flight controllers and aircraft maintenance (Federal Aviation Administration) and for veterinary medicine (Department of Agriculture).

A recurring problem in the field of accreditation is the use of widely varied terms by associations or agencies as they (1) evaluate educational institutions or programs according to a set of predetermined standards or qualifications, and (2) admit them to membership or place them on a public list of approved institutions. The New York Regents have used the term "register" for almost 200 years. The American Medical Association and the American Bar Association for decades used the term "approve." The Oklahoma Regents for Higher Education currently use the term, "accredit." The federal government since 1952 has "listed" institutions that are "eligible" for federal funding programs. And most programmatic or institutional associations use the term "accredit" for those institutions that are admitted and retained in full membership. Most educators, particularly those involved in association efforts, would prefer to reserve the term "accredit" for their own activity. Some federal government officials likewise prefer this use of the term. However, in the past two centuries the evaluation and recommendation process has involved many terms and varied voluntary or state groups—and proper historical treatment requires a broad definition. Using this comprehensive approach, five rather arbitrary periods provide a framework for a historical review of accreditation: from 1787 to 1914; from 1914 to 1935; from 1935 to 1948; from 1948 to 1975; and from 1975 to 1980.

The long period from 1787 to 1914 provided the formative base and most of the structure of our current system. In 1787 the University of the State of New York (New York Regents) was reorganized and required by law to yearly visit and review the work of every college in the state, register each curriculum at each institution, and to report to the legislature. Other states adopting similar legislation in this period were Iowa (1846), Utah (1896), Washington (1909), Virginia (1912), and Maryland (1914).

In 1847 the American Medical Association became the first

voluntary programmatic association. Although it had an early Committee on Education, many bogus or poor medical degrees existed, and it took six decades of effort prior to the improvement in medical education that took place in the decade from 1905 to 1914.

Regional associations grew up at the end of the nineteenth century when the situation in higher education became quite confused. Contributing to the confusion were: the development of new academic disciplines and a new diversity of institutions such as normal schools and other professional schools, junior colleges, universities, and technical colleges; the elective system and the breakdown of the classical curriculum; great expansion of both secondary and postsecondary education, often with no clear distinction among the types of institutions, leading to the question, "What is a college?"; and the lack of commonly accepted standards for admission to a college or for completing a degree. To alleviate these problems, educators formed four of the regional associations during this period—New England, Middle States, Southern, and North Central. By 1895, they covered all of the United States except the Pacific Coast and some mountain states. Each of these associations worked diligently for stronger and more explicit academic standards. However, it was 1912 before the North Central Association established the first set of 12 very specific criteria for accreditation, and 1913 when they published the first list of fully accredited institutions.

Federal activity during this first period began in 1867 with the establishment of the first Department of Education, a statistical agency with a very small budget. However, in order to publish directories of institutions and summary data the agency staff had to define "college" and "high school." By 1870, 369 colleges had been listed.

By 1910, the number was 602, and Kendric Babcock, the first specialist in higher education, developed a list of colleges grouped according to their educational quality. Presidents Taft and Wilson both ordered the list withdrawn and would not allow it to be published. Because of the requests from German universities for such a classified list, the Association of American Universities published it in 1914. Colleges were divided into three groups, reflecting the success of their students in graduate schools. This became the most prestigious list in the country and made the Association of American Universities the major recommending body for the following 40 years.

During the period from 1914 to 1935, the other three regional associations established accrediting standards and put them into

operation. In the 1930's, however, the North Central Association adopted a new principle of accreditation, less objective in nature and based on judging an institution in terms of its purposes and its total pattern as an institution. This new principle, later adopted by other regionals, made it possible for accrediting to be adapted to the ever widening spectrum of postsecondary education.

National institutional associations started when, in 1926, the National Home Study Council was formed and began setting standards in correspondence education. Eleven specialized programmatic associations were started: business; law; library science; music; engineering; and dietetics; plus five associations related to medical care—podiatry, veterinary medicine, nurse anaesthesia, pharmacy, and optometry. The proliferation of accrediting associations in the medical care field had begun. As a result, the American Medical Association, working with the occupational and physical therapists, developed the "umbrella" approach to accreditation; engineering also adopted this approach. Since 1924, institutional presidents, through their own associations, have tried to limit the number of accrediting associations with which they would work. The umbrella concept was one attempt to deal with the problem of fragmentation and multiple visitations, a problem that persists to this day.

Between 1935 and 1948 specialized associations continued to proliferate, including: chemistry; journalism; architecture; art; theology; Bible schools; plus the Liaison Committee on Medical Education and four more agencies in the medical field—medical technology, medical records, occupational therapy, and physical therapy. The federal government made serious efforts to stop the operations of degree mills using laws against fraud and abuse of the postal service. The apparent need for state controls on degree mills led to another push during the late 1930's toward state standards and state accrediting of colleges and universities. After numerous discussions and national conferences on the topic, the emphasis was left on voluntary accreditation and only the most flagrant degree mills were put out of business.

Between 1948 and 1975, major changes took place in every aspect of accreditation. In 1948, the Association of American Universities stopped its "listing" of institutions, which for 40 years had been the most important form of accreditation listing of the educational quality of institutions. A number of major adaptations resulted. The Western and New England associations officially became accrediting associations rather than discussion organizations. The numbers of specialized associations skyrocketed, with 17 widely-known

associations established—from social service and psychology to construction education and funeral direction, plus many special medical groups. Many other such associations came into existence, although they are not widely known beyond their discipline. Presidents of large institutions set up the National Commission on Accrediting in an effort to stem the tide, with very limited success. The voluntary regional associations set up a Federation of Regional Accrediting Commissions of Higher Education to collaborate where possible on common goals, standards, and procedures. These two different and influential groups tried to work together and finally merged in 1975.

However, the major new development of this period was in the federal role, which grew because of massive increases in federal funding of institutions and of student assistance. One of the largest providers of student assistance funds, the Social Security program, uses no accrediting listings and provides funds directly to those persons entitled to them. Seemingly, the Social Security system has minimal difficulty compared with the others. Nevertheless, the Veterans Administration, since 1952, and the Department of Education, with almost two dozen separate funding acts to administer, make extensive use of lists from accrediting associations to determine institutional "eligibility." As a result, current literature describes the resulting relationship as a "triad" including federal listing for eligibility purposes as a new major factor, along with state chartering and licensure and the web of voluntary membership associations.

The federal funding programs and direct federal involvement in the accreditation areas have led to significant changes. In 1968, the Division of Accreditation and Institutional Eligibility was set up in the U.S. Office of Education to handle the increasing federal paperwork involved in recognizing accrediting associations and their member institutions. By the early 1970's the National Commission on Accrediting and the Federation of Regional Accrediting Commissions in Higher Education, joined together in one major comprehensive organization—the Council on Postsecondary Accreditation—to unify all voluntary accrediting efforts, especially in relation to this new federal effort.

From 1975 to 1980, the new Council on Postsecondary Accreditation has been a major factor in attempting to stem proliferation, and to stop federal efforts to turn voluntary membership associations into quasi-governmental organizations with police powers. COPA has developed, also, an extensive program of research and publication in accreditation and has taken the lead in analysis of continuing problems. For example, new educational delivery sys-

tems and colleges with satellite campuses all across the nation pose real problems for evaluation by regional associations. COPA has served as a focal point for research on accreditation relating to such nontraditional education. COPA has had some limited success in slowing down the development of new programmatic associations. However, the federal approval agency (which recently changed its title to the Division of Eligibility and Agency Evaluation) has approved several more associations than has COPA. Also, the medical field continues to expand because of technological advances, and each new device or system seems to need a new accrediting association.

The growing federal impact on accreditation through its "listing" process has also spawned two new purposes for accreditation: protection of the education consumers' rights, and realization of social equity goals.

Looking to the future, it seems clear that the police powers of government cannot be turned over to voluntary associations; the states actually have the police powers in the field of education. Thus, some form of dual effort by states and voluntary membership associations appears very possible. Current systems in effect in Oklahoma and Maryland may well be indicative of future directions.

Introduction

Accreditation associations and related accrediting activities originated almost a century ago to solve problems related to college admissions of high school graduates by diploma rather than examination and the maintenance of academic standards in "colleges" (Selden 1960, p. 42). Colleges, universities, and public high schools had spread rapidly during the last half of the nineteenth century and particularly after the 1870's when the Kalamazoo case made it legal to use tax funds for support of high schools. But with the breakdown of the classical curriculum, the development of the elective system, the addition of new degrees, and the drive to push some elementary college subjects into the high schools, it had become hard to define a "college." Many colleges provided "preparatory" schools on their campuses; and some faculties "approved" high schools and worked closely with their teachers to be sure their graduates could do "college" work. Selden graphically summarized the situation:

> The panorama of collegiate education at the turn of the past century presents a scene of active confusion: students being enrolled in increasing numbers from more secondary schools by institutions being founded at a rapid rate—normal schools, teachers colleges, junior colleges, technological institutes, schools of art, conservatories of music, professional schools, liberal arts colleges, universities—offering courses from agriculture to zoology. All this, but with no commonly accepted academic standards or admission requirements, and even no common definition of a college. (Selden 1960, p. 28)

A century later educators in the United States face similar problems. The development of "nontraditional" education again raises questions about course and degree standards, and poses the old question, "What is a college?" And, with declining enrollments, there are genuine problems in recruitment and student admissions. Ernest Boyer, president of the Carnegie Foundation for the Advancement of Teaching, has stressed the need for improving relationships between high schools and colleges to improve and strengthen the quality of education at all levels (Boyer 1980). He also has announced that the Carnegie Foundation again will support an extensive multi-year project to focus on these problems—as it did at the turn of the past century.

Accreditation for both high schools and colleges, primarily by

voluntary groups, has become the chosen social instrument designed to help meet such needs. Currently, there are many varied accrediting organizations that have grown up to maintain academic standards in various fields and to meet other related needs that have developed. Fortunately, this widespread and quite sophisticated group of accrediting associations now exists and has the potential for solving the increasingly complicated problems we face in the 1980's.

The complexity of the task becomes evident from the broadened list of purposes ascribed to accreditation. Selden (1960) noted two other purposes in addition to the two given above: "the stimulation of institutional self-improvement" and "a countervailing force to the many external and some internal pressures that are continually being exerted on our educational institutions" (p. 42). Two decades later the purposes have expanded greatly as far as the federal government is concerned; nine are stated in the November 1979 list of Nationally Recognized Accrediting Agencies and Associations prepared by the Division of Eligibility and Agency Evaluation (now) of the Department of Education.

1. Certifying that an institution has met established standards;
2. Assisting prospective students in identifying acceptable institutions;
3. Assisting institutions in determining the acceptability of transfer credits;
4. Helping to identify institutions and programs for the investment of public and private funds;
5. Protecting an institution against harmful internal and external pressures;
6. Creating goals for self-improvement of weaker programs and stimulating a general raising of standards among educational institutions;
7. Involving the faculty and staff comprehensively in institutional evaluation and planning;
8. Establishing criteria for professional certification, licensure, and for upgrading courses offering such preparation; and
9. Providing one of several considerations used as a basis for determining eligibility for federal assistance. (p. 1)

The much broadened scope of accreditation activity and responsibility implicit in this listing of purposes reflects the great changes in higher education during recent decades; however, even this list is incomplete. Currently, federal agencies such as the Veterans Administration, the Division of Eligibility and Agency Evaluation, and the General Accounting Office would like to add such purposes as assurance of institutional "probity" and protection of consumers from fraud and deceptive practices. These

purposes are a far cry from the educational goals of accreditation that attract thousands of persons to volunteer their services to "the cause." These unresolved questions of the purposes of accreditation must be faced and answered in the years to come.

This report will deal primarily with accreditation at the post-secondary level, providing a historical perspective for current problems and the consideration of future possibilities. Key questions to be addressed revolve around our unique, voluntary, non-governmental form of accreditation. How did it start and how has it changed in purposes and processes? How does it differ among the various accrediting associations and other entities involved (states, regions, and federal government)? Does it measure academic quality, analyze institutional integrity, and protect both consumers and institutional autonomy? What are the legal implications in today's litigious society? And what role(s) will accreditation play in the coming decade?

What Is Accreditation?

Definitions of accreditation have been expanded and refined over the years along with changes in social purposes. The first of the regional associations, the New England Association of Colleges and Secondary Schools, developed in the 1880's when leading headmasters and principals felt that "... if the secondary school personnel in New England could meet and discuss problems occasionally with college leaders [mostly related to confusion in admission practices] a better relationship between them could be achieved." Charles W. Eliot of Harvard agreed and the New England Association of Colleges and Secondary Schools was established for this purpose in 1885 (Fuess 1960, pp. 5-6). The Southern Association of Colleges and Schools originated from a meeting called by Chancellor Kirkland and the faculty of Vanderbilt University in 1895. The purpose of the meeting was:

> 1. To organize southern schools and colleges for cooperation and mutual assistance.
> 2. To elevate the standard of scholarship and to effect uniformity of entrance requirements.
> 3. To develop preparatory schools and cut off this work from the colleges.
>
> On this basis an organization was effected and a constitution and by-laws were adopted. The following institutions were the charter members: Vanderbilt University, University of North Carolina, University of the South, University of Mississippi, Washington and Lee University, Trinity College. (Association of Colleges and Schools of the Southern States 1926, p. 7)

In the official history of the Association, Agnew (1970) noted some of these problems of definition:

> Throughout the South there were private academies and "colleges," most with inadequate faculties and ill-defined curricula. Many college students were at the "preparatory level." From this educational anarchy the Southern Association sought to bring about order by defining the difference between preparatory schools and colleges.
>
> The major thrust of the Association for the first fifteen years

> was to establish requirements for graduation from secondary schools and to establish admission and graduation requirements for colleges and universities. (pp. 2-3)

This thrust led to early definitions of accrediting, namely the establishment of requirements for admissions, educational program needs, and degrees, followed by recognition of the schools and colleges that met them.

This definition still basically prevailed in the 1930's when the North Central Association of Colleges and Secondary Schools carried out a massive study of the entire field of institutional evaluation and accreditation activities. G. F. Zook and M. E. Haggerty (1936) who conducted the study used the term "accreditment" and and defined it as:

> . . . the recognition accorded to an education institution in the United States by means of inclusion in a list of institutions issued by some agency or organization which sets up standards or requirements that must be complied with in order to secure approval. (p. 18)

As recently as 1960 Selden continued the use of a similar, relatively straightforward definition but with a change in emphasis toward the "process" as opposed merely to "recognition" or institutional "listing."

> What actually is accrediting? Basically, accrediting is the process whereby an organization or agency recognizes a college or university or a program of study as having met certain pre-determined qualifications or standards. (p. 5)

In 1960 federal use of and impact on accreditation was still quite limited. However, Harold Orlans' comprehensive, federally-financed study of accreditation published 15 years later reflects the effects of increased federal involvement.

> In 1968, the U.S. Office of Education defined accrediting as "the voluntary process whereby an agency or association grants public recognition to a school, institute, college, university, or specialized program of study that meets certain established qualifications and educational standards, as determined through initial and periodic evaluations." In 1974, the "voluntary" was dropped, for somewhat the same reason, one suspects, that a recent report characterized the "perception of accreditation as a private activity" as "anachronistic." The use of accreditation to determine eligibility for government funds and other public benefits has lent an involuntary and public character to accrediting activities once regarded as entirely "voluntary" and "private." (Orlans 1975, p. 2)

As Orlans and his staff finished their massive study, the National Commission on Accrediting and the Federation of Regional Commissions of Higher Education banded together to form the new Council on Postsecondary Accreditation. In 1980, after six intense years as COPA's first president, Kenneth E. Young proposed that "voluntary accreditation" should be defined in terms of a concept, a process, and a status. His three-part definition states that accreditation is:

> . . . a concept . . . unique to the United States by which institutions of postsecondary education or professional associations form voluntary, non-governmental organizations to encourage and assist institutions in the evaluation and improvement of their educational quality and to publicly acknowledge those institutions, or units within institutions, that meet or exceed commonly agreed to minimum expectations of educational quality.
>
> . . . a process by which an institution of postsecondary education formally evaluates its educational activities, in whole or in part, and seeks an independent judgment that it substantially achieves its own objectives and is generally equal in quality to comparable institutions or specialized units. Essential elements of the process are: (1) a clear statement of educational objectives, (2) a directed self-study focused on these objectives, (3) an on-site evaluation by a selected group of peers, and (4) a decision by an independent commission that the institution or specialized unit is worthy of accreditation.
>
> . . . a status of affiliation given an institution or specialized unit within an institution which has gone through the accrediting process and has been judged to meet or exceed general expectations of educational quality. (COPA 1980 a, pp. 1, 5).

Clearly, this precise definition represents the educators' long-held view of what accreditation is, and leaves out governmental purposes of fund eligibility and consumerism.

A recurring problem with all such definitions is the use of many other terms for a similar evaluation process and/or status. For example, "approval" has meant essentially the same thing as "accreditation" for such widely varied entities as the American Medical Association, the American Bar Association, and the official agencies of the State of Maryland (Orlans 1975, pp. 4-5). The Board of Regents of the University of the State of New York "evaluates program effectiveness" and "registers" all institutions and programs that have been "approved" (Birch 1979, p. 90). Wilkins, in her 1959 study of accreditation in the several states, noted:

> . . . considerable variation and some confusion in the terminology used to describe the accrediting activities in the States. State departments of education commonly use the term approve but State universities use accredit. Other terms used to describe the process are accept, appraise, certify, classify, license, recognize, and register.
>
> Accredit and approve are used interchangeably in some States and to represent different functions or activities of different agencies in others. In Maryland, the law uses approve, but the attorney general has ruled the term to be synonymous with accredit. In Connecticut and Wisconsin approve applies to courses or fields but accredit to institutions. Many States reserve the term accredit for voluntary accrediting agencies and designate their own function as approve. . . . The Board of Education of the District of Columbia licenses degree-granting institutions, but using the same criteria, accredits junior colleges. The New York Board of Regents terms its accreditation or approval of curriculums registration. Vermont certifies to the educational standing and financial status of corporations seeking authority to confer degrees. The Universities of Illinois and Mississippi do not accredit or approve, but they do classify institutions for use on their own campuses. (p. 40)

Educators, in the main, have preferred to limit the use of the term "accreditation" to the activity defined by Young and performed by voluntary, nonprofit associations. In addition, they have encouraged the voluntary associations to use the term "accredit" rather than "approve," or other similar terms. For example, "at least since its 1952 entry into the recognition of accrediting agencies, the Office of Education has been disposed to legitimate private, not state *accrediting* . . . [and] has thrust the word [accredit] on . . . the American Medical Association and the American Bar Association that have called their own activities "approving" . . . [and] shunned any use of the word "accrediting" in connection with the activities of state bodies." (Orlans 1975, pp. 5, 30)

Widespread use of varied terms for the process of evaluating and recognizing various types of educational institutions remains a problem in this field. The great number of independent actors in the arena and their diversity in powers and goals make an absolutely precise definition impossible to achieve. In the main, this report will use the term "accredit" according to Young's definition, with occasional use of other terms where a legal entity uses another term to mean a relatively comparable concept, process, and status.

The Structure of Accreditation

Voluntary accreditation provides an excellent example of the American way of solving a wide variety of social problems. When our federated republic was created the founders provided for a carefully detailed separation of powers. They worried about a strong statist-oriented central government. As a result, the 10th Amendment established the states with "general" powers and the federal government with "limited" powers—only those specified in the Constitution. The 10th Amendment also reserved "general" powers to the citizens of the states.

From this beginning, and through long tradition, Americans have come to depend for many functions on voluntary enterprise, in contrast to private business or government. Their extensive use of voluntary organizations by the 1830's was described by Alexis de Tocqueville in one of his famous observations about the American scene.

> Americans of all ages, all conditions, and all dispositions constantly form associations. They have not only commercial and manufacturing companies, in which all take part, but associations of a thousand other kinds, religious, moral, serious, futile, general or restricted, enormous or diminutive. The Americans make associations to give entertainments, to found seminaries, to build inns, to construct churches, to diffuse books, to send missionaries to the antipodes; in this manner they found hospitals, prisons, and schools. If it is proposed to inculcate some truth or to foster some feeling by the encouragement of a great example, they form a society. Wherever at the head of some new undertaking you see the government in France, or a man of rank in England, in the United States you will be sure to find an association (de Tocqueville, II, 1946 [1840] p. 106).

Hundreds of thousands of such associations existed by 1913 when the 16th Amendment legalized collection of federal income taxes. Since then, tax-exempt status has been given to millions of voluntary nonprofit organizations in 17 major categories, from agricultural and cultural to health, religious, and veterans' organizations. In the educational organizations group, "accreditation" is one of 35 large subgroups (Harcleroad 1980). It provides a superb example of the long-term effectiveness of the voluntary sector.

Overall, education has been reserved as a state activity.

Federal institutions have been limited in the main to those related to an assigned federal responsibility, the "common defense." The voluntary, third sector has supplemented state activity and in some cases preceded state operations. This was true in the organized preparation of teachers, for example, where private normal schools preceded the state-funded normal schools.

The first state to provide for "accreditation" of colleges and universities was New York in 1787. In that year, the Regents of the University of the State of New York were established as a corporate body to "charter, endow, and control" higher educational institutions in the state, as well as elementary and secondary schools, museums, and libraries. The Regents were required to regularly visit the institutions and to maintain adequate standards (Carmichael 1955, pp. 2-4). The Regents, in turn, required regular reports from the institutions, themselves reported to the legislature, and acted to accredit (register) all institutions under their jurisdiction.

Most other states, however, did not establish such an agency at least for a century—and some not to this day. Finally, in the 1870's and 1880's the need became critical for stronger academic standards and institutional evaluation of the rapidly expanding secondary schools and colleges. The logical solution was to establish new voluntary membership associations. Between 1885 and 1895 such organizations developed to cover most of the country, except for the Pacific Coast area, which followed suit after World War I (Orlans 1975, p. 9).

Since the establishment of these organizations, voluntary accrediting has come to be used by every sector of our society: the private enterprise sector; the public enterprise, governmental sector; and other organizations in the voluntary enterprise, nonprofit sector (Harcleroad 1980).

Basic structure of accreditation

Within the above constitutional and social structure the state governments, voluntary, nongovernmental membership associations, and the federal government agencies have developed complementary, closely intertwined roles.

State governments have the ultimate responsibility for almost all education (except military institutions, primarily). All of them provide two structural components and some a third. First, they incorporate, by charter or license, the institutions that provide educational services in the state. This takes place at two levels of regulation, which Kaplin (1975) delineates:

> The first level is incorporation or chartering, a function performed by all states. Some states have very general laws for nonprofit corporations, some have statutes particularly for eleemosynary institutions, and some have special statues for incorporating educational institutions. . . . The states also have responsibility for registering foreign corporations (i.e., those chartered in another state) which do business in their jurisdiction. . . . The second level of regulation is represented by licensure. This is a more substantial form of regulation because it involves education requirements in addition to corporate ones. Such requirements are generally imposed as a condition of offering education within the state, granting degrees, or using a collegiate name. Not all states have licensure requirements, and their strength and enforcement varies among those that do. Often accredited institutions are exempted from all or most requirements. (p. 3)

In addition to licensing "institutions" states also license "individuals" to perform many occupations and professions within the state. Hundreds of professions and occupations are now licensed in the various states, and over the past century many state licensing rules have been closely tied-in with specialized, programmatic accreditation. In some cases, the professionals in the field serve in the institutions providing the educational program, on the licensing standards boards of the states, and on the specialized accrediting boards. Until recently, this close relationship has been considered desirable and in the public interest. In all cases, provisions for professional and occupational licensing of individuals have been established by state governments.

Finally, 17 states have established agencies or commissions with direct legal charges to "accredit" institutions and programs or with general powers that have been used for this purpose (Birch 1979, pp. 172-4).

Voluntary accreditation associations come in two basic groups: those that accredit institutions and those that accredit programs. The institutional accrediting associations are further divided into those with national and those with regional, multi-state responsibilities. *National institutional associations* include the American Association of Bible Colleges, the Association of Independent Colleges and Schools (essentially business schools), the National Association of Trade and Technical Schools, and the National Home Study Council. The *regional institutional associations*, six in number, are the Middle States Association of Colleges and Schools (5 states plus the District of Columbia, Puerto Rico, Virgin Islands, and Panama Canal Zone); the New England Association of Schools and Colleges (16 states); the North Central

Association of Schools and Colleges (17 states); the Northwest Association of Schools and Colleges (7 states); the Southern Association of Colleges and Schools (11 states); and the Western Association of Schools and Colleges (2 states, Guam, and the Trust Territories of Micronesia).

Since they are voluntary membership associations, changes occasionally take place in state participation in the various geographic-regional associations. For example, Montana moved from the North Central Association to the Northwest Association many years ago. In 1928-29 Arkansas was "prompted to leave the Confederacy and join the North Central Association" because of concern for fairer treatment (Hill 1966, pp. 29-30). More recently, there has been a major effort to combine the Northwest and Western Associations into one larger association and to incorporate Colorado, Wyoming, New Mexico, and Arizona from the North Central Association in the new association. The higher education institutions in most of the area have agreed to this but secondary school commissions have, to date, prevented the move.

All of the associations have secondary school as well as postsecondary commissions. Also, the New England Association has a separate commission for independent schools, the Western Association has a separate commission for community and junior colleges, and the New England and Southern associations have special commissions for occupational, vocational, technical, and career institutions.

In addition, a number of the associations accredit postsecondary institutions outside the United States. The Southern Association has accredited two institutions in Mexico since the 1950's, recently accredited one institution in the Bahamas and U.S. military schools in Japan and Germany; and admitted to candidacy status an institution in Nigeria. The National Home Study Council has accredited an institution in Belguim, and the Association for Independent Colleges and Schools, an institution in Costa Rica. The Middle States Association has accredited institutions in France and Switzerland and admitted to candidacy status institutions in England and Switzerland (Harris 1979, pp. 314-5, 337).

The specialized programmatic accrediting group breaks down into three groups: the well-known associations recognized by the Council on Postsecondary Education (40) and the Division of Eligibility and Agency Evaluation of the Department of Education (68) (COPA 1979; DEAE February 1980); the large number of operating accrediting associations that have not bothered with such recognition; and the various state and federal agencies that "approve" institutional programs for various purposes through systems using program evaluation studies and site visits.

These latter two groups have little national visibility and do not work with other groups; however, individual campuses and programs know them well—and covet their "approval" or "accreditation" as some of them call it. Some examples of the second group are the International Association of Counseling Services, the Institute of Food Technologists, the National Athletic Trainers Association, and the American Institute of Planners. There are many more of this type of professional association and they have a considerable effect on campuses. The third type of accrediting body includes state agencies in such fields as nursing, engineering, and accounting that must "approve" programs before students can use licensed facilities for field work or internships and sit for licensing examinations. Two examples at the federal level are the Veterans Administration, which must "approve" programs in recreation and music therapy (for example) before students in these programs can undertake field work or internships in V.A. hospitals, and the Federal Aviation Administration, which accredits schools and their programs to prepare flight controllers and aircraft maintenance personnel. In fact, the education section of Federal Aviation Administration seriously considered applying for recognition on the U.S. Commissioner's list as a specialized accrediting agency, but in 1976 the General Counsel provided an opinion that "the Office of Education does not have the authority to recognize a Federal Agency as a nationally recognized accrediting agency" (Advisory Committee 1976, pp. 21-2).

Although the second and third types of programmatic accreditation are important, and do affect institutional operation in significant ways, not enough is known about them in their entirety to more than note their existence in the structure. Future reference in this report to specialized programmatic accreditation will refer to the first type.

The federal aspects of the structure of accreditation derive from governmental "listing" responsibilities: summarizing the states' educational activities and publishing a list (since 1870); and publishing a list (since 1952) of "nationally recognized accrediting agencies and associations that [the Secretary of Education] determines to be a reliable authority as to quality of training offered by an educational institution" (Pub. Law 82-550, Sec. 253, 1952). This "listing" responsibility provides the legal basis for the Secretary of Education, after an extensive review, to "recognize" accrediting associations as one main source of information regarding the eligibility of institutions to participate in federal funding programs (Conway 1979, pp. 158-69; see also Finkin 1978).

The recent indirect but emphatic federal entry into the ac-

creditation area has led to the use of the term "triad" as a symbol of a three-part structure for accreditation (Kaplin 1975). The "triad" concept describes three operations: first, states "charter" or license and in some cases "accredit" institutions; second, accrediting associations admit to membership, and thus "accredit," most institutions that provide programs of acceptable educational quality; third, the federal government, through its taxing and spending power, provides funds to postsecondary institutions and students on the basis of institutional "eligibility" derived from "listing" approved, nongovernmental, voluntary accrediting associations.

This uneasy and troubled "triad" provides the basic structure for accreditation as we enter the 1980's. Developments over two centuries have brought us to this stage. Although the most critical changes occurred recently, some trends have a long history. The two centuries can be divided into five periods that correspond to accrediting trends in the U.S.: 1787-1914, 1914-1935, 1935-1948, 1948-1975, and 1975-1980. A concise consideration of these five periods should provide a basis for an informed estimate of possible future developments in this little known but increasingly important field.

Historical Development of Accreditation

This section will discuss some of the forces, particularly activity of states or federal agencies, influencing accreditation during each of the five periods. The first period runs from the formal establishment of the University of the State of New York as the first accrediting agency in 1787, until 1914, when the Association of American Universities formally listed recognized colleges. The second period runs from 1914 to 1935, the time when the North Central Association embarked on a more qualitative and less quantitative approach to accreditation, and the American Medical Association began an "umbrella" or cluster type of accreditation. The third period continues to 1948 when the "listing" form of accreditation by the Association of American Universities was terminated. The fourth period concludes with the establishment of the Council on Postsecondary Accreditation in 1975, and the fifth period takes the discussion through 1980.

The First Period: 1787-1914

The University of the State of New York (the New York Board of Regents) was established in 1784 as a board for King's College (now Columbia University) and other colleges or schools in the state. After three years of bickering, very similar to current impassioned accreditation discussions, the law was revised in 1787, with Columbia and all other such institutions to have their own boards. The Regents were empowered and required to visit every college in the state yearly, to register each curriculum at each institution, and to report yearly to the legislature. These conditions continue today in substantially the same form (Birch 1979, pp. 89-91; Orlans 1975, pp. 6-7; Selden 1960, pp. 29-30; Wilkins 1959, p. 31). Thus, accrediting activity began at the state level. Iowa followed New York's lead in 1846, Utah in 1896, Washington in 1909, Virginia in 1912, and Maryland in 1914 (Wilkins 1959, p. 31).

Voluntary, nonprofit educational associations apparently began with the American Medical Association in 1847. Although it established early a Committee on Medical Education, little effective control was exerted until after 1900 when the Association reorganized. This had become essential because of the low state of professional schools of all types, including medicine. Reid (1959) recounts that: "In 1880, John Norris, a crusading Philadel-

phia editor, helped expose some of the earliest debasers of American higher education by buying a set of bogus degrees in medicine, law, and other fields for $455. Through revelations in his newspaper, the evidence was subsequently used to convict the proprietors of these 'colleges'" (p. 12). In 1905, after its reorganization, the American Medical Association:

> ... published a classification of medical schools based solely on the percentage of licensure examination failures for each school. This classification was followed by another rating system based on ten categories and on inspections of each school.... This second classification, completed in 1907, comprised 82 schools in Class A (approved), 46 in Class B (probation), and 32 in Class C (unapproved), for a total of 160 schools. The latter classification was not made public, although each school was advised of its individual standing. As a result, resentment of the council developed, and its work might have floundered had it not been for the concurrent interest of a recently created foundation ... it turned to the Carnegie Foundation for assistance ... Abraham Flexner was appointed to conduct the study, and he was assisted throughout by Dr. N. P. Colwell, secretary of the Council on Medical Education. Their report was completed and published in 1910 and provided substantial support for the steps already initiated by the council of the AMA ... Flexner and Colwell personally visited each of the 155 schools in existence at the time of the study ... by 1915 the number of schools had been reduced to 95—a reduction of 40 percent—largely as a result of the impetus that Flexner gave to the movement initiated by the AMA. In that year, the council again classified the schools: 66 in Class A, 17 in Class B, and 12 in Class C. The others had closed or merged. (Selden 1971, pp. A3-4)

This action in the field of medicine clearly demonstrated the viability of specialized programmatic accrediting associations. Other specialized associations that began accrediting activities during this period are the Association of American Law Schools (1900), the American Osteopathic Association (1897) with its Committee on Education in 1901, and the Society of American Foresters (1900) (Petersen 1980, pp. 86, 115, 249)*

The beginnings of the regional associations have been mentioned earlier. Four of them were formed during this first period, but only the North Central Association (1895) established and applied standards of accreditation. The *Proceedings of 1912* listed 12 criteria, many quite specific, and in 1913 the first list of fully

*All other dates for the founding of accreditation organizations are derived from Petersen's source book (1980).

accredited colleges and universities was published (Geiger 1970, pp. 187-8). The list included 73 diverse institutions in 14 states. Two Illinois junior colleges were on the first list, plus five normal schools and teachers colleges on a separate unclassified list.

Related federal activity during this period began with the establishment of the first U.S. Department of Education in 1867 (Cartter 1966, p. 58). It had limited funds and was primarily a statistical agency, collecting, listing, categorizing, and periodically publishing directories and summary data. To perform this function, however, it had to answer the question, What is a college? and decide what institutional categories to use. It pushed higher education toward standardization. In 1870, a list of 369 institutions was developed. Such lists were issued fairly regularly and by 1910, 602 institutions were reported (with a number of institutions that would not be included today) (Orlans 1975, p. 36).

In 1910, the first specialist in higher education, Kendric Babcock, was appointed:

> [He] took it as his first task to work with the Association of American Universities in the preparation of a list of colleges grouped by quality [as measured by the success of graduates in pursuing advanced degree programs]. In what proved to be a decision setting a Federal pattern for fifty years, President Taft ordered the withdrawal of the published listing, and President Wilson, despite the plea of the AAU to the contrary, upheld the decision in 1914. From that time until the passage of the Veterans Readjustment Act in 1952, the Office of Education was merely a bystander in the field of collegiate accreditation. (Cartter 1966, p. 59)

Despite this limitation on the Department of Education, the Department of Agriculture essentially accredited in the field of veterinary medicine for many years. In 1879, veterinary surgeons for the U.S. Army were required to hold a degree. Starting in 1894, graduation from a veterinary college was required before an applicant could take the civil service examination for positions in this field. By 1908 the Department of Agriculture and the Civil Service Commission had established program regulations for all students who wished to be admitted to the examinations. Since many positions were in the government agencies, great leverage existed; Orlans classified it as "accrediting," an oddity in the checkered history of accreditation (Orlans 1975, pp. 3-4).

The Second Period: 1914-1935

During this period the Southern (1917), Middle States (1919), and Northwest Associations (1923) established accrediting standards

and put them into operation. The Western College Association started as a membership discussion group in 1924 and the National Home Study Council (1926) began setting standards for correspondence education. Eleven special programmatic associations started: podiatry (1918), business (1919), law (1923), library and music (1924), dietetics (1927), nurse anaesthesia (1931), pharmacy and engineering (1932), and optometry (1934). Also, in 1932 the American Veterinary Medicine Association began accrediting activity; it replaced the Department of Agriculture as the accreditor in this field in 1957 (Selden 1960, p. 100).

A major development of this period was the decision by the Association of American Universities to publish, in 1914 the federal list of institutions that Presidents Taft and Wilson had withheld from publication. The German universities had requested such a classified list to use in admissions decisions. This 1914 AAU listing divided colleges into three groups, reflecting the success of their graduates in AAU graduate schools. Eventually, they published a single, very prestigious list that was of preeminent stature until dropped in 1948 (Orlans 1974, p. 15).

The other major change in this era took place in the early 1930's in the North Central Association. After a lengthy study, completed in 1934, the Association adopted a new, less objective basic principle of accreditation, stating that:

> ... an institution will be judged in terms of the purposes it seeks to serve and on the basis of the total pattern it presents as an institution of higher education, [and] the North Central not only abolished the old outdated standards but it evolved a radical approach by initiating a new additional purpose of accrediting, that of providing external stimulation to institutions for their continual growth and improvement. ... With the increasing use of the pattern which included both an institutional self-survey and a team of qualified institutional inspectors, stimulation for college and university improvement was practiced more widely as a major purpose of regional accreditation. (Selden 1960, p. 41)

During this period, the expansion of specialized agencies led institutional presidents, through their associations, to make efforts to diminish the influence and stunt the growth of these agencies. In 1924, both the American Council on Education and the National Association of State Universities took actions to this effect. But there was little change and in 1926 NASU published its own limited list of accrediting associations with which it and its members would cooperate (Orlans 1960, pp. 17-8). The number of such new associations set up shortly thereafter provides the best evidence of the "law of limited success" of such moves, then and ever since.

Another useful precedent with modest beginnings at this time was the "umbrella" approach to accreditation. Some medically-related associations in such fields as occupational therapy and physical therapy worked with the American Medical Association to jointly develop "essentials" or "standards" and accrediting processes. Engineering also adopted such a system and its diverse fields worked together to develop the Engineers Council for Professional Development. This important principle has alleviated somewhat the fragmentation and multiple-visitation problems that plague institutions.

The Third Period: 1935-1948

Despite the problems of the Depression and World War II, additional accrediting associations continued to appear. The "umbrella" concept developed further and in 1942 the Liaison Committee on Medical Education was formed by collaboration of the AMA with the Association of American Medical Schools. New professional associations were established for the following fields: chemistry (1936), dentistry (1938), occupational therapy (1935), physical therapy (1936), medical technology (1936, with AMA), journalism (1946), medical records (1943), architecture (1940), art (1944), and practical nursing (1945). Two national institutional associations initiated accrediting activity, the Association of Theology Schools (1936) and the American Association of Bible Schools (1947).

Finally, the last "open" geographical area of the country was filled by the expansion of the Western College Association into accrediting activity in 1948. Previously, California institutions had been served by the Northwest Association and the University of California. Clearly the movement toward standards and accrediting of both institutions and programs was a response to needs in the society.

Although relatively out of accreditation activity since 1914, the Office of Education, after 1937, did sponsor a series of conferences and studies at the request of the chief state school officers. They were concerned about diploma mills (including such earlier infamous cases as Oriental University, Potomac University, and the Branch Institute of Engineering and Science); complaints from abroad as well as from the home front (Reid 1959, pp. 23-42); and in particular, approval of teacher education programs. The study of "the phases of accreditation, especially from the viewpoint of the responsibilities of the states" reported:

> . . . it seems inevitable that some fundamental change in the machinery of accrediting must take place . . . the authors of

> this bulletin are convinced that such change should be in the direction of placing greater responsibilities upon appropriate agencies in the several States . . . The proposal here made is for the State to maintain an accrediting agency to cooperate with these regional and national agencies and not to compete with them. The imperative need for the accrediting services of these agencies during the transition period is recognized and it is hoped that until any given State does set up satisfactory accrediting machinery, the regional and national associations will continue to function as accrediting agencies in that State. (Kelly et al. 1940, pp. 206-7, in Birch 1979, p. 26)

A follow-up conference by the American Council on Education in 1941 stressed the value of the voluntary regional and national associations while encouraging them to cooperate with state agencies. It effectively defused the report and delayed until recently any further significant efforts to enlarge state responsibilities for accrediting and institutional evaluation.

In the meantime the voluntary regional associations consolidated their position nationally (Carter 1966, p. 60). All of them moved to some degree toward the new principle of the North Central Association, basing accreditation of individual institutions on the institution's own objectives rather than on a single set of standardized criteria. This helped them later to adapt accrediting to a wide diversity of institutions—and prepared them partially for the post-war wave of new institutions.

The Fourth Period: 1948-1975

As World War II wound down, the AAU announced its departure from accreditation. With its prestigious list no longer available, the regional association lists became much more important. As a consequence, in 1948 the Western College Association embarked on the accreditation task. At the same time, the presidents of a number of major universities established the National Commission on Accrediting (1948) to try *again* to stop the proliferation of new, specialized associations and to trim the wings of those in existence. It soon became apparent that it was at best a holding operation since many new ones started up: health education (1964), health administration (1948), medical assistance (1966), psychology (1952), speech and hearing (1964), funeral direction (1970), construction education (1974), home economics (1971), chiropratic (1971), public health (1974), physical therapy (1964), rehabilitation (1971), social work (1952), interior design (1971), respiratory therapy (1956), services to the blind (1967), and clinical laboratory sciences (1973). Two new national institutional associations also

began: The Association of Independent Colleges and Schools (1952) and the National Association of Trade and Technical Schools (1965). And the National Home Study Council established an independent Accrediting Commission in 1955.

The major new development of this time, however, was the passage by Congress of the Veterans Readjustment Assistance Act of 1952. The first act, in 1944, had led to widespread abuse. Congress determined that accreditation would be a useful mechanism to assess quality of education and to eliminate the fraud and cheating. Previous clearances by federally-funded "state approval agencies" had not been sufficient. As Finken (1978) explains:

> State approval had, in many instances, been no more than a rubber stamp. A role for the Office of Education was proposed and, to some extent, contested by the Veterans Administration. As part of the resulting compromise, state approval agencies were authorized to approve courses offered by an institution that had been accredited "by a nationally recognized accrediting agency or association" and, as a facility for state approval agencies, the Commissioner of Education was authorized to list such accrediting agencies: "for the purposes of this Act the Commissioner shall publish a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution."
>
> This solution rested upon three closely related assumptions. First, the statute assumed that "nationally recognized accrediting agencies" existed and were of sufficient reliability that state government could permissibly piggy-back its own approval of courses upon the private agency's decision-making processes. Second, reliance upon private determinations of educational quality would obviate the threat of federal control of education. Third, the role of the Commissioner of Education in determining that such nationally recognized agencies were of sufficient reliability would be essentially ministerial. The last assumption, reflected both in language that merely directs the Commissioner to publish a list and in the legislative history, is a necessary corollary of the other two; it would be anomalous for the government to avoid the direct regulation of educational institutions by regulating the substantive standards of accrediting agencies, thereby doing indirectly what the statute was intended to avoid. (p. 2)

This relatively innocuous bit of legislation has provided the basis for much of the controversy surrounding accreditation in recent years. At first, the tie-in with eligibility for federal funding was perceived as positive, particularly by the regionals, which

were much more directly affected by it than were other accrediting agencies. For example, Geiger (1970, p. 56) in his official history of the North Central Association noted that:

> Concrete endorsement of the regional associations' position came from both private and public agencies. When the Ford Foundation made a half billion dollars available for grants to colleges and universities in the mid-1950's, the first stipulation was that applicants must be accredited. Other philanthropic organizations tended to observe the same limitation. Such endorsements were soon to be augmented immeasurably after Federal funds became available for educational institutions, because the United States Office of Education adopted the policy of relying on the evaluations of the regional associations as a basis for determining institutional eligibility for grants. (Geiger 1970, p. 56)

The national institutional associations were (and are) positive about federal "listing," since it has provided them official standing and recognition never achieved previously. In fact, one of them, the National Association of Trade and Technical Schools, was set up in 1965 as a direct result of the 1952 legislation and the subsequent changes on the accreditation scene. In 1964, student financial assistance in nursing was made dependent on accreditation by the National League for Nursing, and later in 1968 by regional associations or state boards of nursing (Cartter 1966, pp. 61-2).

Several of the regionals set up separate commissions in the occupational and technical areas between 1962 and 1970 to provide a broader service and to try to maintain a regional approach to the vocational aspect of postsecondary education. Some regionals, however, did not take this approach. Minnesota, in the North Central region, became a battleground and the "Mondale amendment" in the Education Amendments of 1972 made it possible for federally-recognized state agencies to certify or "accredit" vocational institutions that wished to participate in federal student-assistance programs (Orlans 1975, pp. 44-5).

As federal student-assistance programs have grown to become a major source of student and institutional income, the length and specificity of the federal regulations have increased dramatically, especially since 1968, when the Commissioner of Education established a special Division of Accreditation and Institutional Eligibility to work in this area. The expansion of criteria for judging and recognizing the associations to include a number of social goals, such as monitoring non-discrimination practices, and consumer concerns, such as assuring fairness of refund policies, had

created considerable distress in the educational community by 1975.

In the late 1960's and early 1970's it became clear that regional and national institutional accrediting forces would have to band together to have much effect. The Federation of Regional Accrediting Commissions and the National Commission on Accrediting—described by Orlans (1975 p. 26) as "two bears in a cage"—approached accreditation from almost totally different viewpoints. A major study by Claude Puffer (1970) emphasized the need for a national organization or council of all parties interested in accreditation. After sparring for several years they combined in 1975, with the strong support of the Washington-based higher education associations, to form the Council on Postsecondary Accreditation (COPA). The pattern of organization reflects the recommendations of Jerry W. Miller, based on his extensive study of opinions of leaders in the field.

> . . . nongovernmental accreditation should be embraced in a national system, utilizing national standards and procedures. At the head of this national system . . . the national body would:
>
> 1. Have a membership from institutions, institutional accrediting agencies, specialized accrediting agencies, professional groups, and the public.
> 2. Have a membership composed of one-third public representatives and two-thirds professional educators.
> 3. Have authority derived from acting in the public interest and enforce its decisions through the weight of public sanctions.
> 4. Provide leadership for nongovernmental accreditation.
> 5. Recognize agencies to grant institutional and specialized accreditation.
> 6. Relate to all types of postsecondary accrediting agencies, without regard to types and levels of institutions they serve.
> 7. Finance its operations by means of a surcharge on the accrediting fees and/or budgets of agencies it recognizes. (Miller 1973, p. 151-2)

The Fifth Period: 1975-1980

The first six years of COPA have been active ones. An apocryphal story, recently published, has it that Kenneth Young, its first president (from 1975 to 1980), was told by "a lawyer well-versed in the complexities of accreditation" that he hoped Young had not "just signed on as captain of the Titanic." (Jacobsen 1980,

p. 1) In spite of this possible future, COPA thrives and has contributed greatly in its short life.

With its broad constituency COPA is described as a "balance wheel for accreditation," or "main gear to interrelate (1) the general public, (2) users of accreditation, (3) general accrediting agencies, (4) specialized accrediting agencies, and (5) national associations representing institutions" (COPA 1979, pp. 2-3). The COPA board after extensive discussions identified five major priorities:

> (1) dealing with the problems associated with proliferation and specialization in accreditation; (2) evaluating educational quality and measuring outcomes of education; (3) coping with the role of government (federal and state) in accreditation; (4) developing a national education-information program on accreditation; and (5) selecting, training, and evaluating volunteers in accreditation. (Young 1979, p. 139)

Proliferation of accrediting agencies has continued to be a problem and is related to the third of the priorities. Those expecting a cutback as a result of the establishment of COPA have been disappointed. A thorough review process has been instituted; the additions have been slowed but the number of active accrediting agencies has grown. For instance, an accrediting body for landscape architecture was added in 1976 (Petersen 1980). However, in the same year, a new "umbrella" group in the medical-health area was approved; the Committee on Allied Health Education and Accreditation (CAHEA) represents "21 Review Committees, representing 45 collaborating allied health organizations, in the accreditation of programs in 26 areas of allied health" (Petersen 1980, p. 131). A majority of accrediting associations are in the medical-health field (Proffit 1980, p. 11) and much of the constant pressure of additions comes from technological advances in medical care. The discovery and use of radiation alone "has generated a number of allied health professional occupations" (Martin 1980, p. 9). Many of these rather minute specialties in the past have been taken care of by on-the-job training or apprenticeship programs. But currently there is pressure for special licensing of each separate specialty. Although COPA approved CAHEA as an umbrella organization in this field, the issues are far from resolved.

Of course, proliferation is not limited to COPA's professional recognition, since the Division of Eligibility and Agency Evaluation (DEAE) of the Department of Education also lists institutions eligible for some 30 federal-funding programs. The list of eligible institutions is derived from a number of sources, including those

listed by accrediting associations and listed by DEAE as a result of its recognition process. DEAE, as of February 20, 1980, lists 75 separate associations or commissions, including a state agency (the New York State Board of Regents) and several other associations in fields such as dance, theater, and noncollegiate continuing education. COPA's shorter, more restrictive list includes some not on the DEAE list, such as the American Chemical Society, the American Council for Construction Education, the Council on Rehabilitation Education, and the American Home Economics Association. The staff of the *Chronicle of Higher Education* recently prepared and published a total, merged list of involved associations (Jacobsen 1980, pp. 8-10).

The listing of accrediting associations and their member institutions, however, provides only a portion of the total of eligible institutions maintained by DEAE. In 1977, then Commissioner Boyer outlined the composition of the list in a letter to Senator Paul Laxalt, which was later publically distributed:

> Of the 8,544 institutions on the Commissioner's eligibility list:
> (a) 854 are foreign institutions;
> (b) eleven are chartered by the Federal Government;
> (c) 7,679 are either chartered or licensed by States; and
> (d) none is other than a postsecondary institution.
>
> Among the postsecondary institutions on the list of eligible institutions (whether chartered by the Federal Government, or licensed/chartered by States):
> (a) 6,348 are accredited (includes 3,885 hospital-based programs in allied health);
> (b) 327 are candidates for accreditation;
> (c) 98 are institutionally certified;
> (d) 86 are State approved;
> (e) 831 became eligible under the National Vocational Student Loan Insurance Act; and
> (f) 854 are foreign institutions, approved as comparable to U.S. institutions for purposes of the Guaranteed Student Loan Program (only). (Boyer 1980, pp. 1-2)

Over the years since 1952, the now-Department of Education has been able to approve institutions in a variety of ways, as the data above clearly indicate. The actual number of accredited U.S. postsecondary *institutions* apparently is 2,463, when the number of "hospital-based programs" is subtracted from the 6,348 classified as "accredited." The Secretary of Education (and formerly, the Commissioner of Education) has the power, and clearly exercises it, to approve institutions *and* programs on other bases, "contained in over 20 statutory provisions" (Conway 1979, p. 167). Other means include: (1) use of an appointed advisory committee if no

nationally recognized agency is qualified to accredit; (2) the use of the "three-letter rule," where an institution's students can transfer with credit to three currently accredited institutions; and (3) the "reasonable assurance" or "satisfactory assurance" method where it is determined that an institution will meet accrediting standards within a reasonable time (Orlans 1975, pp. 40-2; Conway 1979, p. 160). Eligibility for institutional participation in some federal student financial-assistance programs clearly has been possible within a less formal framework also (on a very limited basis) in such cases as foreign institutions, or the notorious West Coast Schools case. The confusion of "eligibility" for federal programs with "accreditation" and/or "licensure" has existed for a quarter-century but has been pinpointed as a major future concern only during the COPA period.

Another current proliferation problem relates to multiple accreditation: when there is more than one association in a given field, and when the various states use different agencies or associations for the recognition or accrediting of similar programs. The State Approving Agencies, financed by the Veterans Administration, may accept institutions on the DEAE list; but at different times and in different states this process has varied significantly (Conway 1979, pp. 162-3). The National Commission on Accrediting and COPA, as a matter of wise educational policy, tried to limit accreditation to one association in any given field. It never worked in law where the American Bar Association accredited more law schools (some with a more practical bent) than the Association of American Law Schools (Orlans 1975, p. 32). An example of even more direct long-term competition exists in the medical technology/clinical laboratory area. And recently, the American Physical Therapy Association has withdrawn from its relationship with the American Medical Association; in 1977, it was added to the COPA and DEAE lists of approved associations while the Council on Allied Health Education and Accreditation continues to accredit programs in physical therapy (78 approved programs in 1980) (Petersen 1980, p. 132). The number of such multiple accreditation bodies is not large in proportion to the whole; however, the possibility exists of additional withdrawals from umbrella groups such as engineering, allied health, and medical specialties. If the physical therapy decisions are a precedent, the problems in the future could become even greater.

COPA's major effort in the area of information dissemination and research has been significant. Literature has been developed through a series of widely distributed topical papers on such key topics as legal issues, evaluation purposes, principles and systems, confidentiality, effects of collective bargaining, and educational

auditing. Several major studies of aspects of accreditation have been undertaken by COPA with financing from major foundations or federal agencies. In particular, studies have been conducted on nontraditional education and education on military bases. COPA itself has funded or cooperated on studies of *Accrediting Standards and Guidelines* (Petersen 1979) and multiple accrediting relationships (Kells and Parrish 1979). The question of common terminology and definitions is currently being addressed and should be ironed out in the next year or two.

COPA has several sub-groups working on one of accreditation's long-standing problems, the need for inter-associational cooperation in self-study procedures and standards and in institutional site visitations. Although final standards have not yet been developed, in 1978 COPA board adopted a set of "Interim Guidelines on Interagency Cooperation in Accreditation." The "Guidelines" set forth six principles:

1. Facilitating cooperation between and among institutional and programmatic accrediting agencies should be an objective of COPA, the accrediting agencies, and the institutions served by them.
2. Consistent with the concept of voluntary accreditation, each institution of postsecondary education should decide for itself whether to seek accreditation by any appropriate agency or combination of agencies.
3. Institutions desiring coordinated accrediting activities, particularly among agencies accrediting programs located within the same academic administrative unit (i.e., a School of Professional Studies), should be offered every possible assistance and cooperation.
4. Coordination begins with the designation of responsibility within the institution for liaison with the various accrediting agencies.
5. To be successful, coordination requires advance planning by both the institution and the accrediting agency or agencies involved.
6. Representatives of each accrediting agency will be responsible to their parent agency for investigation and reporting activities carried out as part of the accrediting cycle. (COPA 1978, p. 2)

Finally, COPA's major priority deals with accreditation's major task, "evaluating educational quality and measuring outcomes of education," including the "selecting, training, and evaluating of volunteers in accreditation." Many of its conferences and publications deal with these problem areas. Almost all of its participants are volunteers and through its efforts much has been done to enlarge their numbers and background knowledge. The various

member associations carry on most of the actual selection and training efforts for both on-campus self-study and association efforts; these have been stepped up significantly in recent years. The entire process depends greatly on this effort being successful. Semrow (1977) has pointed out that:

> Accreditation decision-making is built upon a two-tiered system which encompasses a peer review process. On the one hand the institution is expected to conduct a study and analysis of its operations in the light of its mission statement, its goals and purposes, and its program objectives . . . On the other hand, the Commission provides for an on-site evaluation review by a team of persons independent and outside the institution. This constitutes the peer review which utilizes as its basis the institution's self study. This process is carried out both substantively and procedurally . . . [and] is based upon the concept that individuals schooled in the disciplines and research and acquainted with the organization and processes of postsecondary institutions are able to exercise their competence and expertise and apply their problem-solving ability to fundamental questions concerning institutional effectiveness. (p. 3)

COPA has had limited effect in this area, and advisedly so. It has set a tone and emphasized direction but left to the regional, specialized, and national institutional associations the significant efforts toward actual improvement of the details of the accrediting process.

Possible Future Roles for Accreditation

A number of basic issues in the field remain controversial and unresolved. Most are long-standing, with some contemporary twists. Some of these issues are: concerns regarding consumer protection; diversity in postsecondary education and the problem of "What is a college?"; the recent federal success in increasing its power and control over higher education through relating its "listing" and "funding" powers; and the expansion of state activity in institutional accrediting beyond the power to incorporate and charter institutions and to license individuals.

Consumer concerns relate first to the perennial degree-mill problem and second to illegal or questionable uses of federal student assistance programs. Federal attempts to get a few unwilling voluntary accrediting associations to validate institutional probity are quite problematical, since this involves turning over government "police" powers to non-governmental organizations. In the long run, this is primarily a state problem and function. Past federal efforts through postal regulations and now through non-governmental agencies have been ineffective (Pugsley 1976, p. 17). The best effort to date is the "model" legislation prepared by the Education Commission of the States in 1973. According to ECS:

> . . . variety and diversity continue to contribute to the vitality of postsecondary education. Its general availability to virtually all Americans also steadily increases, and this should continue. However, while vitality and availability flourish, there is the danger that questionable, unethical, or fraudulent practices may exploit the manner in which postsecondary education is offered and conducted. Prior to 1972, the United States Office of Education reported that approximately 2,700 postsecondary institutions were accredited by agencies recognized for this purpose by the Office of Education. In addition, there were about 300 unaccredited colleges and universities in the United States. Of the 300, it was estimated that about 110 could be considered "diploma mills," essentially providing no training or education, but selling degrees for a price. The other 190 may not have satisfied the standards for accreditation but were making honest efforts to meet the required standards.
>
> With the inclusion in the 1972 Amendments of much less restrictive criteria for qualifying for federal funds, an expanded recognition of viable and acceptable postsecondary

programs and institutions was encouraged. Thus, rather than 3,000 colleges and universities, current estimates suggest a total of approximately 14,000 institutions and programs comprising the range of postsecondary institutions, including traditional higher educational institutions, postsecondary vocational and technical institutions, and other private and proprietary schools. Accordingly, while the actual number of institutions and programs with questionable, unethical, or fraudulent practices may be small, the leeway for such practices may be greater, and estimates suggest that unsuspecting consumers may be fleeced of several million dollars each year.

Since the legal responsibility for authorizing the existence and continuation of postsecondary educational institutions, programs, and courses of study rests fundamentally with the states, it follows that a logical step for controlling questionable, unethical, or fraudulent practices would be enactment of statutes or amendments of existing state laws for this purpose on certain guidelines or models. (1973, pp. v-vi)

In the years since its publication, this model had had significant effect; however, much remains to be done by a large number of states.

The organized educational profession, through its associations, has developed another very important thrust—a serious effort at self-review and self-regulation based at the American Council on Education. The COPA and ACE boards have approved a code, "To Assure Fair Practice Toward Students," along with a series of self-regulation initiatives in areas such as transfer and award of academic credit (El-Khawas 1979). If adopted by institutions, this program could help improve public attitudes about institutional practices in matters of consumer concern.

In the second area, the increase in nontraditional efforts at diversity in postsecondary education makes quality control difficult. Satellite programs at great distances from home campuses and contracts with educational brokers to provide courses or programs under the rubric of an approved institution are the main sources of this problem. COPA has conducted a national study of this area (Andrews 1978) resulting in the following 10 significant findings:

- The nontraditional education movement is a positive and creative force in American postsecondary education, providing added stimulus for needed reform and specifically focusing on the issues of equality of access, quality of results, and individual achievements.
- Nontraditional, alternative learning, as a concept, is

achieving acceptance among the constituent groups of American postsecondary education.

- Primary problems with nontraditional education forms are internal and related to inadequacy of processes and procedures in implementation.
- An increasing number of traditional institutions are adapting and integrating the characteristics of the nontraditional movement into their own programs.
- A commitment to nontraditional education by the institution is essential for the development of acceptable programs. This includes the proper relationship to purpose, faculty support, and allocation of institutional resources.
- The critical questions about the purposes of postsecondary education in relation to curricula and degree expectations and assessment of educational outcomes have been raised as a result of the nontraditional ventures.
- Nontraditional education has been identified as a shift of valence rather than a split within postsecondary education.
- Institutional accreditation should operate within a single mode that will accommodate all of postsecondary education, recognizing both process and performance components in the evaluation of institutions.
- Institutional accreditation should consider and determine its appropriate role in such matters as institutional integrity and consumer protection.
- Traditionalists and nontraditionalists should close ranks and work together as equal partners in American postsecondary education to identify problems and find solutions. (Andrews, 1978, pp. 18-9)

Significant efforts by the regional and national institutional associations have led to continuing improvements in educational quality in nontraditional education. Holding accredited institutions strictly accountable for their "contracted" programs has cut down on their number and improved many still remaining. A number of institutions have cut back greatly on their extended-campus programs. In 1980, for example, two institutions that had operated nationwide now restrict off-campus operations to their own state or to very limited activity in other states.

A third area of concern in accreditation is the expansion of federal controls, despite serious opposition from many sectors of society. Federal funding power continues to grow and as long as it does, controls will follow. A move in the past two years to have the "eligibility" of institutions rest on state "accrediting" rather than voluntary non-governmental accreditation has been stoutly resisted by the higher education community. Recently, both the

COPA board and ACE have moved to support a policy position developed by an interassociation committee of presidents. This policy statement, as adopted by the COPA board, includes the following points:

> • Accreditation should be linked to eligibility for federal funding, and the process of accreditation (as part of education) should be insulated from the administrative processes of the federal government. . . .
>
> • The federal government should rely, primarily and as appropriate, upon the review and evaluation of accrediting agencies as carried out by the education community. . . .
>
> • In such sensitive areas as education and accreditation the federal government should be doing no more than specifically authorized by the Congress. . . .
>
> • The Commissioner/Secretary of Education should have some discretion to justify making a nonaccredited institution eligible for federal funds, and any use made of this discretion should be reported annually to the Congress. . . .
>
> • The federal government should carefully reexamine the current status and use of the "satisfactory assurance" and "three-letter" authorities to waive accredjtation as a condition for eligibility. . . .
>
> • Institutional accreditation should be sufficient under the Higher Education Act, and no institution need acquire specialized accreditation to participate in the student-aid programs authorized in that Act. . . .
>
> • Concerns with the current eligibility system should, if possible, be resolved through administrative changes; and COPA should not encourage Congressional hearings at this time. (COPA 1980b, pp. 102)

Although this policy has created some additional controversy, it represents just another step in the effort since 1912 to have accreditation stay a voluntary activity, rather than a responsibility of federal government agencies.

In previous writing on this subject, Harcleroad (1976) observed that there are six possible methods of accreditation:

1. The present system unchanged. Although there are several important concerns expressed by various publics, it does the job now and at very low expense.

2. The present system with modifications, such as increasing regional staffs or by contracts with outside profitmaking companies of specialized auditors.

3. State higher education agencies or commissions without the benefit of the regionals and possibly without the national spe-

cialized associations. In 1979, Birch found that these bodies currently were responsible for accrediting four-year institutions and more than two-thirds of their executive officers expected or planned for their agency to get into institutional accreditation.

4. State agencies charged by law with the evaluation of performance, and which would conduct performance audits of all public educational state units. These normally are performed for legislative review committees or are a standard part of state operational controls.

5. Expanding the responsibility of the State Approving Agencies which currently approve all state educational institutions, public or private, for the Veterans Administration. Cost of the operation of these agencies is now borne by the federal government, totalling approximately $15 million a year. Although they are not staffed to perform institutional accreditation, the structure is in place to take over the entire accreditation function if the states allow it.

6. Federal agencies, operating to protect the consumer and to supervise the use of the funds distributed by the federal government. Consumer protection bills and institutional eligibility bills would bring the federal agencies into much greater control of institutional operations and the voluntary accreditation process.

The current unrest and change in accreditation is ample evidence that the structure of accreditation of the 1960's and 1970's is no longer acceptable, even though inexpensive and with long historical justification. Although almost everyone in the education profession would prefer the second of the six options outlined above, there is a strong possibility of a move toward option three. The fourth option is not a genuine possibility at this time; although state agencies may be used on occasion for special evaluative activities, there seems to be no possibility that this could become a pervasive plan throughout the country. The fifth option, the State Approving Agencies, is a possibility, since the structure could be used to implement a joint federal-state initiative in this area; but the improvements and changes being made in existing accreditation structures will keep this plan on a back burner, even though the Veterans Administration will continue to use this procedure. Finally, the option of accrediting solely by federal agencies seems possible only if increasing federal funding brings greater federal control over state boards and commissions. Federal funding does not necessarily require greater federal control over accreditation, however, as the example of the Social Security Administration demonstrates: Thousands of students at thousands of institutions receive funds through Social Security, yet the agency uses no form of listing, approval, or accreditation in dispersing the funds.

A combination of the second and the third options seems the most likely plan for the near future. This possibility will become even more viable if both regional and national associations continue refinements in their process and increase the objectivity of an admittedly subjective activity. The six-step process of "educational auditing" outlined below (adapted from Harcleroad 1976) follows plans now in use; however, it provides a few refinements that could improve voluntary accrediting operations and help continue its acceptability as the major social "institution" used to determine the educational quality of postsecondary education institutions and to report it to the public:

1. The institution conducts a self-study and prepares two formal reports that include the educational statements of the institution and a short-form report for publication. A short-form report prepared by the institution and the formal short-form report of the educational auditing team should, together, make up an official short-form report to be published in the institution's catalog, included with the president's report to the board, and distributed to the public. The long-form report also should be presented to the board of the institution.

2. The regional commission appoints a visiting committee when notified that the institution requests a special visit; otherwise, a committee is appointed several months in advance and assignments of special responsibilities of team members are established.

3. The team of educational auditors, specialized committee members, and the chair conducts an on-site investigation to verify the assertions in the educational and financial statements.

The data required in these statements should make it possible for the educational auditing team to render a judgment and to prepare an appropriate management letter, plus a verified short-form report. If the team questions any of the institutional statements these questions should be discussed with the institution and the report changed to satisfy both parties. If agreement is not possible, the educational auditing team should add qualifying footnotes.

The educational auditing team has the same options as a business auditing team: to provide an unqualified opinion, a qualified opinion, an adverse opinion, or no opinion, stating the reasons.

4. The committee submits a report of its investigation to the regional commission, along with its signed statement and its recommendations. The evaluation report is distributed to those who will be involved with it, and copies are sent to the institution for any response it may care to make.

5. The commission officials and the team chair agree on any

factual changes that may need to be made and the final reports are prepared.

There should be a short-form report that is prepared by the institution and accepted by the team's commission for potential inclusion in the catalog of the institution. A long-form report, basically the entire institutional self-study, and the evaluation report prepared by the visiting team should be reviewed by the commission. As a result of this consideration, the commission should take appropriate action and notify the institutional officials.

6. The institution carries on its regular annual self-study, analyzing its achievement of the goals it set. It reports to the commission on any substantive changes. If they require modification of the certified short-form report, a new visiting committee examines and reports on the substantive change. To foster continuous self-study, it is desirable that each institution assign skilled educators to implement and monitor the process. They should be knowledgeable about the entire process, and as capable of applying the auditing, evaluative, and procedural standards as the persons on the visiting teams. If not, the team should note this fact and one of the responsibilities of the commissions should be to assist the institutional staff to develop such competency.

A plan of this type could strengthen existing institutional accrediting review and reporting procedures. Most of the national and regional institutional associations now use a comparable framework. The few suggested refinements and additions, plus inter-associational cooperative work with the specialized programmatic organizations, would do much to dispel current institutional concerns about the entire process; just as important, it could strengthen voluntary accrediting efforts in relation to state and federal initiatives in this field.

The states also must strengthen their efforts, particularly in the area of chartering and licensing institutions, before a truly cooperative effort can be mounted with accrediting associations; however, in the meantime, a number of state commissions and boards already perform accrediting activities (Birch 1979). The Ohio Board of Regents, for example, at its meeting on February 16, 1979, took action to grant Lakeland Community College accreditation "for its emergency medical technician-paramedic training program." The Minnesota Higher Education Coordinating Board in January 1979 granted "approval to three postsecondary educational institutions and conditional approval to a fourth school under the private institution registration program." The California Postsecondary Education Commission currently authorizes the operation of all independent, degree-granting colleges in California, with three methods by which they can be es-

tablished: accreditation by a national or regional accrediting agency, approval by the Superintendent of Public Instruction, or authorization by the Superintendent of Public Instruction. These examples indicate the close relationship between state higher education agencies or commissions and the voluntary accrediting process.

Models already exist for other states to follow. For example, Oklahoma, which has the legal responsibility for evaluation and accreditation of the state's postsecondary institutions, follows a standard plan of site visitation based on an institutional self-study, with a careful review of the data by the Regents staff prior to recommendation to the Oklahoma Regents. All new institutions are required to go through this process. After initial approval, if they are then accredited at a later date by the North Central Association, the Regents will accept that accreditation (Oklahoma State Regents for Higher Education 1975). This alternative provides limited cooperation between the state agency and the accrediting association and places a great deal of independent responsibility on the association after initial accreditation is achieved.

Another plan for cooperative accreditation activity recently has been developed by the Middle States Association of Colleges and Schools and the Maryland State Board for Higher Education, which may become a prototype for other states. The Maryland Board for Higher Education has developed an extensive plan for institutional evaluation called the Higher Education Evaluation and Development Process (HEED). This is an ongoing process tied to budget development and presentation of annual funding requests to the legislature. In April of 1979, an agreement was reached between the Maryland State Board for Higher Education and the Middle States Association providing very specific ways in which the voluntary accrediting process would be integrated into and supplement the HEED process. The agreement appear as Appendix A (page 44).

The Maryland Board also has developed new standards for non-traditional and off-campus programs operated by collegiate institutions in the state that may indicate another direction for accreditation. The institutions must provide evidence to the Board that their proposed offerings do not duplicate programs already operating in that area of the state. Once approved, programs can operate only in the designated location and must confine their offerings to the specific degree program approved. With the adoption of these new standards, approximately half of the out-of-state institutions conducting programs in Maryland chose to close them down rather than to attempt to comply with the new standards.

> To ensure adequate consumer protection, the standards require the institution to continually provide accurate and current information about itself, issue announcements which accurately portray to the public the purposes and practices of the institution, accurately describe the role and mission of the institution, disclose that it is approved to operate in Maryland, and admit, retain and graduate only those students who meet the stated admission standards of the institution. To protect the rights of its students, the institution should maintain student records in accordance with AACRAO [American Association of Collegiate Registrars and Admissions Officers] guidelines and be consistent with the requirements of the Family Education Rights and Privacy Act.
>
> In general, the institution must assure itself that all students have access to well-developed programs of counseling, testing, advisement, orientation, financial aid, career development, placement and health services. The specific organization of such services, as well as the resources and staffing provided, should be determined by the individual college so long as provision for these services are made. (Maryland State Board for Higher Education, 1980)

A forthcoming document for the Education Commission of the States on coordination and governance in the 1980's provides special emphasis in the area of evaluation and appraisal. One of the recommendations is that each state adopt standards for the authorization of institutions that are at least equivalent to the guidelines in the ECS model legislation developed in 1973. The report also suggests that "it is advantageous for state evaluation and private accreditation to work cooperatively within their complementary but different objectives." It is further recommended that "states require evidence that such accreditation is at least equivalent to its own standards for authorization, if the state accepts accreditation by national or regional accrediting agencies (Education Commission of the States 1980 [draft], pp. 80-2).

Summary and Conclusions

All nonprofit voluntary associations are facing problems in the 1980's, as government in all its forms moves into areas that previously have been reserved for voluntary associations. Except for religious organizations, which are protected by constitutional provisions, the taxing and spending power of the federal government has become pervasive in the entire society. Nielsen (1980) has pointed out:

> A time of planned, governmentalized, officially subsidized, and guided pluralism is upon us. Nonprofit institutions, as one

element of a society in radical transition, will never again be the same in status, relative scale, function, or autonomy.

The leaders of most of the major categories of Third Sector institutions want more government money, not less, and are fully prepared to accept the regulatory consequences. And government, recognizing the impossibility of carrying out its social programs purely through its own lumbering bureaucracy, desires to continue to make extensive use of their capabilities.

Coexistence is therefore the present and future actuality, and for the private nonprofit associations and beneficiaries of government the problem is how to coexist with dignity and integrity despite an essentially inferior and vulnerable position. (p. 24)

In fact, federal bureaucracy is also under grave attack at the present time because of inefficiencies, excessive costs, waste, and a general malaise among the population about the exponential expansion of regulations. Even the Congress has been refusing to approve massive regulatory volumes, which are based on limited legislation and sometimes in direct opposition to the intent of Congress as expressed in hearings.

With these two thrusts operating simultaneously, voluntary nonprofit accrediting associations have much to commend them. Staffed in the main by volunteers, they are much more efficient and less expensive. As long as institutional improvement and educational quality are the basis for volunteer service, these characteristics undoubtedly will continue. On this basis, it appears quite likely that self-regulated, voluntary associations working in the public interest, and for the benefit of the society in which the volunteers live, will continue into their second century.

Appendix A: Agreement Between Maryland State Board of Higher Education and The Middle States Commission on Higher Education

The State Board for Higher Education [SBHE] and the Middle States Commission on Higher Education [CHE] share a common concern for the quality of higher education in Maryland. In their efforts to assist higher education to achieve the highest possible levels of excellence in the State, and in order to avoid duplication and imposing undue burdens, the SBHE and the CHE will work cooperatively in the evaluation and accreditation of Maryland's public institutions of higher education.

To facilitate this cooperation, the following procedures will be observed:

Self-study report

When a public institution completes a self-study report in preparation for an evaluation visit by the CHE, it will submit copies of its report to the SBHE at the same time as they are submitted to the CHE.

The SBHE is particularly concerned with the quality of an institution's administrative capabilities, finances and management, and with its physical plant maintenance. The CHE is also concerned with these issues as well as with the educational quality of the institution. Each institution will be encouraged to develop a balanced self-study report, with supportive or supplemental information to be available on campus to the visiting team.

Evaluation team visits

The CHE will assign evaluation teams in accord with its policies and procedures, tailoring the teams to the particular character and needs of each institution. Team members will be from outside the State of Maryland, and where possible and appropriate the CHE will also assign people from outside the Middle States region to chair and/or to serve as team members. The SBHE will be given an opportunity to comment on the selection of the team chairman prior to his/her final appointment by CHE. If necessary, the SBHE will share with the institution being visited the cost of the additional travel expenses for extra-regional visitors.

The CHE will notify the SBHE of dates of scheduled evaluation

visits to public institutions in Maryland. The SBHE will assign up to three persons to work with the CHE team and will provide directly for their expenses. SBHE team members will be expected to work closely with the CHE team members, but they will be free to pursue their own agenda and to conduct their own deliberations.

Evaluation reports

Although they share common interests and concerns, the focus of the SBHE is different from that of CHE. Therefore, separate reports will be prepared by the team members representing the State Board and the team members assigned by the Commission on Higher Education. The SBHE team members' report will deal primarily, but not necessarily exclusively with the administration of the institution and the capabilities of its administrators, with the financial and management aspects of the institution and with physical plant maintenance. The CHE team members' report will address these same subjects but it will also focus directly on the educational quality of the institution, paying particular attention to outcomes and the extent to which the institution's resources enable it to sustain and/or improve the quality of its programs. The public institutions will continue the practice of submitting copies of the CHE evaluation reports to the SBHE, and the SBHE reports will be shared with CHE.

Periodic review reports

In the fifth year following evaluation for reaffirmation of accreditation, each institution is required to submit to CHE a Periodic Review Report covering the following:

1. a current general overview of the institution,
2. significant developments and/or changes since the previous evaluation,
3. evidence of continuous institutional self-study,
4. indications of responses made or actions taken with respect to recommendations resulting from the previous evaluation,
5. a summary of fiscal and enrollment data for the previous five years and projections for the next five years,
6. an outline of plans for the next five-year period.

The public institutions in Maryland will be expected to submit copies of their Periodic Review Report to the SHBE at the same time they are submitted to the CHE. In the event that the CHE decides that a visit is needed following review of the Periodic Re-

view Report, a joint visit along the lines indicated above will be arranged between CHE and SBHE. In the event that CHE decides that no visit is needed at the time, SBHE will follow its own procedures.

Private institutions

The procedures outlined above do not apply to the private institutions of higher education in Maryland. However, with the institution's approval the Commission will continue the long-standing practice of inviting a representative from the SBHE to accompany each CHE evaluation team visiting a private institution in Maryland.

Communication

Since good cooperation depends upon good communications, the SBHE and the CHE will exchange publications, newsletters, and other pertinent information on a regular basis within the limits allowed by Maryland law and the confidential relationship between the CHE and the institutions it accredits.

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